

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CHARLES HICKS,)	
AIS # 246241)	
)	
Plaintiff,)	
v.)	CIVIL ACTION NO. 2:06-CV-990-MEF
)	
ALABAMA DEPART OF)	
CORRECTIONS, et al.;)	
)	
Defendants.)	

MOTION FOR EXTENSION OF TIME

Come now the Defendants, THE ALABAMA DEPARTMENT OF CORRECTIONS AND RICHARD F. ALLEN, in the above styled-cause, by and through undersigned counsel, and respectfully request an additional thirty (60) days, in which to file their special report and as grounds state as follows:

1. That the Defendants need the additional time to obtain the necessary records to sufficiently respond to the Court's Order of November 6, 2006.

2. That the granting of this extension will not unduly prejudice the Plaintiff.

WHEREFORE, the Defendants request an additional sixty (60) days to file their special report.

Respectfully submitted,

KIM T. THOMAS (THO115)
DEPUTY ATTORNEY GENERAL
GENERAL COUNSEL

/s/Greg Biggs
GREG M. BIGGS (BIG 004)
ASSISTANT ATTORNEY GENERAL
ASSISTANT GENERAL COUNSEL

ADDRESS OF COUNSEL:
ALABAMA DEPARTMENT OF CORRECTIONS
LEGAL DIVISION
301 RIPLEY STREET
P.O. BOX 301501
MONTGOMERY, ALABAMA 36130
334-353-3885

CERTIFICATE OF SERVICE

I hereby certify that on the 6th of December, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and this is to certify that a copy of the foregoing was served upon:

Inmate Charles Hicks, AIS # 246241
Frank Lee Youth Center
P. O. Box 220410
Deatsville, AL 336022

And

Peyton Chapman III &
Paul Jones
Rushton, Stakely, Johnston & Garrett, P.A.
P.O. Box 270
Montgomery, Alabama 36101-0270

by placing a copy of same in the United States Mail, first class postage prepaid and properly addressed this 4th day of December, 2006.

/s/Greg Biggs
GREG BIGGS (BIG 004)
ASSISTANT ATTORNEY GENERAL
ASSISTANT GENERAL COUNSEL